

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

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MARY HEATHER MCAFEE,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Civil Action No.: 3:22-cv-261
	:	
SYNCHRONY FINANCIAL; TRANS	:	
UNION, LLC; EXPERIAN INFORMATION	:	
SOLUTIONS, INC.; and EQUIFAX	:	
INFORMATION SERVICES, LLC,	:	
	:	
Defendant.	:	
	:	

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**SYNCHRONY BANK'S CONSENT MOTION FOR SUBSTITUTION OF PARTY AND  
FOR LEAVE TO FILE ANSWER OUT OF TIME**

Synchrony Bank (“Synchrony”) (incorrectly named as “Synchrony Financial”), with the consent of Plaintiff’s counsel, moves this Court to grant an Order substituting Synchrony as Defendant in this case in place of the original named Defendant, pursuant to Federal Rule of Civil Procedure 21. Synchrony further moves this Court to grant an Order affording Synchrony leave to file an Answer out of time, for reasons detailed in the contemporaneously-filed memorandum.

Dated: May 27, 2022

Respectfully submitted:

/s/ Alison Ross Ellis

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 27th day of May, 2022, I have electronically filed the foregoing using the CM/ECF system, which will automatically send e-mail notification of such filing to all counsel of record as follows:

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